

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

Abdi Nazemian, et al.,

Plaintiffs,

vs.

NVIDIA Corporation,

Defendant.

Master File Case No. 4:24-cv-01454-JST (SK)

**FURTHER JOINT STIPULATION AND
[PROPOSED] ORDER RE DEPOSITION
PROTOCOL SUBMISSION DEADLINE**

Case No. 4:24-cv-01454-JST (SK)

Case No. 4:24-cv-02655-JST (SK)

Pursuant to Civil Local Rule 7-12, the undersigned Parties to the above-captioned action, by and through their respective counsel of record, hereby stipulate the following:

1. WHEREAS, on March 21, 2025, the Parties filed a joint stipulation to extend the Parties' deadline to submit an agreed upon Deposition Protocol or a joint letter brief regarding any disputed areas, from March 25, 2025 to April 24, 2025, which was granted on March 25, 2025 (*Nazemian*, ECF Nos. 128, 130; *Dubus*, ECF Nos. 82, 84);

2. WHEREAS on April 22, 2025, the Parties filed a joint stipulation to extend the Parties' deadline to submit an agreed upon Deposition Protocol or a joint letter brief regarding any disputed areas, from April 24, 2025 to May 15, 2025, which was granted on April 22, 2025 (*Nazemian*, ECF Nos. 131, 132; *Dubus*, ECF Nos. 85, 86);

3. WHEREAS, the parties have made progress toward an agreed deposition protocol, but require additional time to confer regarding the remaining disputed issues, and certain issues may require modifications to the Court's scheduling order (ECF No. 71);

4. WHEREAS, the parties believe that a further extension of the Deposition Protocol deadline is needed so they can avoid burdening the Court with disputes that they may be able to resolve with additional time;

NOW, THEREFORE IT IS HEREBY STIPULATED AND AGREED by and between the Parties and their respective counsel, subject to the Court's approval, that the Parties' deadline to submit an agreed upon Deposition Protocol or a joint letter brief regarding any disputed areas, shall be further extended from May 15, 2025 to May 28, 2025, and the parties will submit any jointly-proposed revisions to the schedule by May 28, 2025.

1 Dated: May 15, 2025

Respectfully Submitted,

2 By: /s/ Elisha Barron

3 Joseph R. Saveri (SBN 130064)
4 Christopher K.L. Young (SBN 318371)
5 Evan Creutz (SBN 349728)
6 Elissa A. Buchanan (SBN 249996)
7 William Castillo Guardado (SBN 294159)
8 **JOSEPH SAVERI LAW FIRM, LLP**
9 601 California Street, Suite 1505
10 San Francisco, California 94108
11 Telephone: (415) 500-6800
12 Facsimile: (415) 395-9940
13 jsaveri@saverilawfirm.com
14 cyoung@saverilawfirm.com
15 ecreutz@saverilawfirm.com
16 eabuchanan@saverilawfirm.com
17 wcastillo@saverilawfirm.com

18 Matthew Butterick (SBN 250953)
19 1920 Hillhurst Avenue, #406
20 Los Angeles, CA 90027
21 Telephone: (323) 968-2632
22 Facsimile: (415) 395-9940
23 mb@buttericklaw.com

24 Bryan L. Clobes (admitted *pro hac vice*)
25 Alexander J. Sweatman (admitted *pro hac vice*)
26 Mohammed Rathur (admitted *pro hac vice*)
27 **CAFFERTY CLOBES MERIWETHER**
28 **& SPRENGEL LLP**
29 135 South LaSalle Street, Suite 3210
30 Chicago, IL 60603
31 Tel: 312-782-4880
32 bclobes@caffertyclobes.com
33 asweatman@caffertyclobes.com
34 mrathur@caffertyclobes.com

35 David A. Straite (admitted *pro hac vice*)
36 **DiCELLO LEVITT LLP**
37 485 Lexington Avenue, Suite 1001
38 New York, NY 10017
39 Tel. (646) 933-1000
40 dstraite@dicellolevitt.com

41 Amy E. Keller (admitted *pro hac vice*)

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Nada Djordjevic (admitted *pro hac vice*)
James A. Ulwick (admitted *pro hac vice*)
DICELLO LEVITT LLP
Ten North Dearborn Street, Sixth Floor
Chicago, Illinois 60602
Tel. (312) 214-7900
akeller@dicellolevitt.com
ndjordjevic@dicellolevitt.com
julwick@dicellolevitt.com

Brian O'Mara (SBN 229737)
DiCELLO LEVITT LLP
4747 Executive Drive
San Diego, California 92121
Telephone: (619) 923-3939
Facsimile: (619) 923-4233
briano@dicellolevitt.com

Brian D. Clark (admitted *pro hac vice*)
Laura M. Matson (admitted *pro hac vice*)
Arielle Wagner (admitted *pro hac vice*)
Eura Chang (admitted *pro hac vice*)
LOCKRIDGE GRINDAL NAUEN PLLP
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Telephone: (612)339-6900
Facsimile: (612)339-0981
bdclark@locklaw.com
lmmatson@locklaw.com
aswagner@locklaw.com
echang@locklaw.com

Justin A. Nelson (admitted *pro hac vice*)
Alejandra C. Salinas (admitted *pro hac vice*)
SUSMAN GODFREY L.L.P
1000 Louisiana Street, Suite 5100
Houston, TX 77002-5096
Telephone: (713) 651-9366
jnelson@susmangodfrey.com
asalinas@susmangodfrey.com

Rohit D. Nath (SBN 316062)
SUSMAN GODFREY L.L.P
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067-2906
Telephone: (310) 789-3100
RNath@susmangodfrey.com

Elisha Barron (admitted *pro hac vice*)
Craig Smyser (admitted *pro hac vice*)
SUSMAN GODFREY L.L.P
One Manhattan West, 51st Floor
New York, NY 10019
Telephone: (212) 336-8330
ebarron@susmangodfrey.com
csmyser@susmangodfrey.com

Jordan W. Connors (admitted *pro hac vice*)
Trevor D. Nystrom (admitted *pro hac vice*)
SUSMAN GODFREY L.L.P
401 Union Street, Suite 3000
Seattle, WA 98101
Telephone: (206) 516-3880
jconnors@susmangodfrey.com
tnystrom@susmangodfrey.com

Rachel J. Geman (pro hac vice)
Danna Z. Elmasry (pro hac vice)
**LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP**
250 Hudson Street, 8th Floor
New York, NY 10013
Tel.: 212.355.9500
rgeman@lchb.com
delmasry@lchb.com

Anne B. Shaver
**LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP**
275 Battery Street, 29th Floor
San Francisco, CA 94111
Tel.: 415.956.1000
ashaver@lchb.com

Betsy A. Sugar (pro hac vice)
**LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP**
222 2nd Avenue S. Suite 1640
Nashville, TN 37201
Tel.: 615.313.9000
bsugar@lchb.com

*Counsel for Individual and Representative Plaintiffs and
the Proposed Class*

1 Dated: May 15, 2025

Respectfully Submitted,

2 By: /s/ Rachael McCracken

3 **QUINN EMANUEL URQUHART &**
4 **SULLIVAN, LLP**

5 Sean S. Pak (SBN 219032)
6 seanpak@quinnemanuel.com
7 50 California Street, 22nd Floor
8 San Francisco, CA 94111
9 Telephone: (415) 875-6600
10 Facsimile: (415) 875-6700

11 Andrew H. Schapiro (admitted *pro hac vice*)
12 andrewschapiro@quinnemanuel.com
13 191 N. Wacker Drive, Suite 2700
14 Chicago, Illinois 60606
15 Telephone: (312) 705-7400
16 Facsimile: (312) 705-4001

17 Rachael L. McCracken (Cal. Bar. No. 252660)
18 rachaelmccracken@quinnemanuel.com
19 865 South Figueroa Street, 10th Floor
20 Los Angeles, CA 90017
21 Telephone: (213) 443-3000
22 Facsimile: (213) 443-3100

23 Alex Spiro (admitted *pro hac vice*)
24 alexspiro@quinnemanuel.com
25 295 Fifth Avenue
26 New York, NY 10016
27 Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Attorneys for Defendant NVIDIA Corporation

[PROPOSED] ORDER

Pursuant to the stipulation of the Parties, it is hereby ORDERED that the Parties' deadline for filing an agreed upon Deposition Protocol, or filing a joint letter brief with the Parties' respective proposals, shall be continued to May 28, 2025.

IT IS SO ORDERED.

Dated: _____

The Honorable Sallie Kim
U.S. Magistrate Judge

ATTESTATION PURSUANT TO CIVIL L.R. 5-1

The filer attests that the other signatories listed, on whose behalf the filing is also submitted, are registered CM/ECF filers and concur in the filing's content and have authorized the filing.

Dated: May 15, 2025

/s/ Elisha Barron
Elisha Barron